

JAP:EEA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

15M 547

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

SHUNELLA MAXLYNINE MENTORE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

FREDDY GOMEZ, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

Upon information and belief, on or about June 14, 2015, within the Eastern District of New York and elsewhere, the defendant SHUNELLA MAXLYNINE MENTORE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent’s information and belief are as follows:<sup>1</sup>

1. On or about June 14, 2015, the defendant SHUNELLA MAXLYNINE MENTORE arrived at John F. Kennedy International Airport in Queens, New York, aboard JetBlue Airlines flight no. 882 from St. Lucia.

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. A CBP canine unit alerted to a plaid "River Fish" checked bag for possible narcotics. As a result, an x-ray examination of the bag was conducted. The x-ray revealed anomalies that appeared to be narcotics inside. The defendant SHUNELLA MAXLYNINE MENTORE was selected for a Customs and Border Protection ("CBP") enforcement examination. While answering standard CBP examination questions, the defendant claimed ownership of a black "Skyway" carry-on bag and an orange "Spring" pocketbook. MENTORE stated, in sum and substance, that she packed all of her belongings in the carry-on "Skyway" bag and did not have any other suitcases. CBP officers presented the plaid "River Fish" checked bag to MENTORE, bearing checked bag tag #5279451850 and the name MENTORE, SHUNELLA. MENTORE was asked if the bag was hers and she claimed it was not. When the bag was opened, it had an unusual chemical smell and it felt unusually heavy. MENTORE was then escorted to a private search room. A pat down was conducted with negative results. At this time, MENTORE admitted to checking the plaid "River Fish" bag. During the examination of MENTORE'S orange "Spring" pocketbook, CBP officers found a checked bag tag receipt #5279451850 bearing the name MENTORE, SHUNELLA. The bottom of the checked bag was probed and revealed a white powdery substance. A CBP officer field-tested the substance, which tested positive for the presence of cocaine. The total gross weight of the cocaine recovered from the checked bag is approximately 2.42 kilograms.

WHEREFORE, your deponent respectfully requests that the defendant  
SHUNELLA MAXLYNINE MENTORE be dealt with according to law.

Dated: Brooklyn, New York  
June 15, 2015



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FREDDY GOMEZ  
Special Agent  
United States Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
15th day of June, 2015

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THE HONORABLE VERA M. SCANLON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK